



MEMO ENDORSED

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June 9, 2008

Via Fax 212-805-7924

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Grace V. Matthews
Docket No.: 08 CIV. 1889 (SHS)
Our File No. 2513.01

Honorable Sir:

Pursuant to a conference call held between myself, plaintiff's counsel and Claude Platon of your chambers on June 6, 2008, I am writing this letter to request an extension of time to complete discovery in this matter. All parties have proceeded diligently with discovery to this point. All depositions have been completed. The parties have exchanged paper discover and the plaintiff has provided us with several authorizations to receive medical records. There remain a few outstanding authorizations which plaintiff's counsel has advised he will be providing shortly.

We are attempting to arrange for an independent medical examination of the plaintiff by a doctor of the defendant's choosing. However, the plaintiff is presently in Florida with no immediate plans to return to the area. Plaintiff's counsel and myself are attempting to set up an examination; however, we both doubt that we will be able to coordinate the event prior to the present June 27th discovery date.

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As such, we would respectfully request a 60 day extension to complete the examination. The reason for this request is that because of the upcoming summer months it may be difficult to mesh the schedules of the examination doctor and plaintiff due to possible vacation time. This is the first request for an extension of the discovery time.

Pursuant to the instructions of Mr. Platten I am faxing this letter to your chambers and copying my adversary on same.

Very truly yours,

Stockschlaeder, McDonald & Sules, P.C.

By:

Richard T. Sules
A Member Of The Firm

RTS:jlh

cc: James Badie, Esq.
Kathleen Smith, State Farm Insurance

6/10/08
Status conf. remains at 6/27;
all discovery except 1 ME to be completed
by 6/27; 1 ME may take place on or before
August 1.

SO ORDERED 6/10/08

Sidney H. Stein
SIDNEY H. STEIN
U.S.D.J.